

EXHIBIT “A”

June 25, 2012
Dennis R. Kurz

Robbie Malone

A Professional Limited Liability Company
Attorneys and Counselors

Robbie Malone

DIRECT DIAL: (214) 346-2625
E-MAIL: rmalone@rmalonelaw.com

NORTH PARK CENTRAL, SUITE 1850
8750 N. CENTRAL EXPRESSWAY
DALLAS, TEXAS 75231
(214) 346-2630
FAX (214) 346-2631

July 3, 2012

Via CM/RRR 7010 2780 0000 4552 5185

Via Facsimile (866) 565-1327

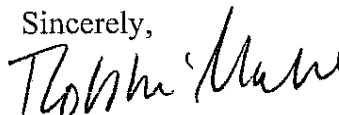
Dennis R. Kurz
Weisberg & Meyers, L.L.C.
Two Allen Center
1200 Smith Street, 16th Floor
Houston, Texas 77002

RE: Cause No. 4:12-cv-00432; RE: *Nicole Payne v. Progressive Financial Services, Inc.*; pending in the United States District Court for the Northern District of Texas, Fort Worth Division.

Dear Dennis,

Enclosed is my client's offer of judgment. If you have any questions, please feel free to call.

Sincerely,



Robbie Malone

RM/mkb

Enclosure

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

NICOLE PAYNE
PLAINTIFF,

v.

PROGRESSIVE FINANCIAL SERVICES,
INC.,
DEFENDANTS.

§
§
§
§
§
§
§
§

Cause No. 4:12-cv-00432

OFFER OF JUDGMENT

Pursuant to Fed R. Civ. Proc. 68, Progressive Financial Services, Defendant herein, desires to resolve the claims against it by the Plaintiff. Defendant hereby offers to allow judgment to be taken against them in the amount of \$1,001.00 as and for damages inclusive of all damages of any kind, whether actual and/or punitive, and specifically alleged in the Complaint herein. Defendant also offers to pay attorney fees in the present lawsuit to be determined by agreement of the parties or court order as of the date of this offer. In addition, Defendant offers to pay the actual, taxable costs of this action up to the date of electronic service of this offer, as the parties may agree or as allowed by a duly entered order of this Court. This offer shall expire fourteen (14) days after the service hereof upon Plaintiff.

The submission of this offer is not intended as any admission of liability by the Defendant, but rather is only an offer to resolve a disputed claim for which the Defendant denies any liability.

Dated:

ROBBIE MALONE, PLLC

A handwritten signature in cursive script, appearing to read "Robbie Malone", is written over a horizontal line.

Robbie Malone

Robbie Malone, PLLC

State Bar No. 12876450

8750 N. Central Expressway, Suite 1850

Dallas, Texas 75231

Telephone: (214) 346-2625

Facsimile: (214) 346-2631

Email: RMalone@RMalonelaw.com